

## **EXHIBIT 45**

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May 26, 2020

By Email

Elizabeth P. Papez  
Patrick F. Stokes  
Gibson, Dunn & Crutcher LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036

**Re: Conferral on the Proposed Order Granting Plaintiff's Motion for Preliminary Injunction served on Villanova Trust in the case styled *Amazon.com, Inc. and Amazon Data Services, Inc., v. WDC Holdings LLC dba Northstar Commercial Partners, et al.*; No. 1:20-CV-484; In the United States District Court for the Eastern District of Virginia, Alexandria Division.**

Dear Elizabeth and Patrick:

This is to memorialize our conferral conversations regarding the Temporary Restraining Order and the Proposed Order Granting Plaintiff's Motion for Preliminary Injunction against Villanova Trust. As I expressed previously, my client Christian Kirschner (trustee of the Villanova Trust) is cooperating with the government in its ongoing investigation into the events referenced in your complaint. Villanova Trust is not in possession of any Amazon confidential or non-public proprietary information. Also, as I stated in our call, the Villanova Trust has no monetary assets in its possession or control.

I look forward to continued discussions as we work to mutually resolve this matter.

Yours very truly,



Chris Flood

CF:lb